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Original

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

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In the Matter of:

E911 Phase II Implementation Report

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Wireless Telecommunications Bureau

**E911 PHASE II IMPLEMENTATION REPORT**

The following carriers, by their attorney, pursuant to 47 C.F.R. § 20.18(i), hereby revise the E911 solution indicated in their joint November 8, 2000 *E911 Phase II Implementation Report* as required by 47 C.F.R. § 20.18(i):<sup>1</sup>

<u>Name</u>	<u>TRS Number</u>
Brown County MSA Cellular Limited Partnership-----	803352
Iowa RSA #3 LLC-----	811380
Iowa RSA #12 LLC-----	811230
Metro Southwest PCS, LLP-----	820838
Northeast Communications of Wisconsin, Inc.-----	802371 <sup>2</sup>
Nsighttel Wireless, LLC-----	820836 <sup>3</sup>

<sup>1</sup> With the exception of Wisconsin RSA #3 Limited Partnership, these carriers are affiliated with and are controlled by the same entity, Northeast Communications of Wisconsin, Inc. None of these companies has any ownership interests in Wisconsin RSA #3 Limited Partnership, however, another of Northeast Communications of Wisconsin, Inc.'s subsidiaries, New-Cell, Inc., acts as the system manager for the Wisconsin RSA #3 Limited Partnership. Each listed carrier is a "Tier III" carrier as defined in the Commission's *Order to Stay*, 2002 FCC LEXIS (FCC 02-210), ¶ 22, that is, each carrier has fewer than 500,000 subscribers as of the end of 2001. It is noted that on a combined basis, Northeast Communications of Wisconsin, Inc., and its affiliates, have fewer than 500,000 subscribers on an aggregated basis.

<sup>2</sup> This is the TRS of its wholly owned subsidiary, Northeast Telephone Company.

<sup>3</sup> This wholly owned subsidiary was not listed on the November 8, 2000 *E911 Phase II Implementation Report* because it was not yet operating. See File No. 0000513164, filed July 6, (continued...)

Wausau Cellular Telephone Company Limited Partnership-----	817988
Wisconsin RSA #3 Limited Partnership-----	803349
Wisconsin RSA No. 4 Limited Partnership-----	803346
Wisconsin RSA-10 Limited Partnership-----	803355

In the November 8, 2000 report it was reported that the carriers intended to utilize a system based E911 solution. At the time the instant report is being filed, none of the listed carriers has been requested to provide Phase II services by any authorized PSAP. However, at this time the carriers wish to advise the Commission that they have decided to implement Phase II E911 services through the use of a handset solution.

Several considerations have led to the decision to change the type of location system to be utilized. The carriers have determined that they will be able to implement a handset based solution more quickly than a network based solution. The Commission recently determined that "carriers should do their utmost to deploy E911 Phase II implementation as rapidly as possible." *Order to Stay*, 2002 FCC LEXIS (FCC 02-210) ¶ 25 (July 26, 2002).<sup>4</sup> The carriers have determined that rather than continue to wait to receive a request for Phase II service from an authorized PSAP, that they would begin to implement Phase II E911 services as quickly as possible. The carriers believe

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<sup>3</sup>(...continued)  
2001 (consummating a *pro forma* assignment of PCS licenses).

<sup>4</sup> The carriers listed herein did not file for waiver the Phase II E911 implementation schedules imposed by § 20.18(g) because they initially selected a system-based Phase II E911 solution and a waiver was not required because no Phase II service requests had been received from any authorized PSAP. Because the carriers have now determined to utilize a handset based solution, and because the carriers are Tier III carriers, and because the decision to change solutions has been finalized within the last 30 days, the carriers request that the E911 implementation timetable outlined at ¶ 33 of the Commission's *Order to Stay* be applied to them. Nothing requires the carriers to alter their original selection and the carriers' intent is to speed delivery of the Phase II E911 service to the public. Because the carriers have only recently decided to utilize the handset Phase II E911 solution, and because the time table specified at 47 C.F.R. § 20.18(g) contains dates which have already passed and contains a final implementation date of December 31, 2002, which is only a few days away, it is respectfully submitted that compliance with the timetable specified in the *Order to Stay* is appropriate.



that the handset implementation time schedule implemented in the July 23, 2002 *Order to Stay*, will achieve provision of E911 services much more quickly, and at approximately one-half of the cost, of the network solution initially selected.<sup>5</sup> Based upon discussions with equipment suppliers, the carriers expect that they will be able meet the Phase II E911 handset implementation schedule specified in the *Order to Stay*. The carriers intend to comply with the testing/ verification requirements of OET Bulletin No. 71 through field testing. Contact person responsible for this report:

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<sup>5</sup> The *Order to Stay* provides the following implementation schedule for Tier III carriers:

- (1) Without respect to any PSAP request for deployment of Phase II 911 enhanced service, the licensee shall:
- (i) Begin selling and activating location-capable handsets no later than September 1, 2003;
  - (ii) Ensure that at least 25 percent of all new handsets activated are location-capable no later than November 30, 2003;
  - (iii) Ensure that at least 50 percent of all new handsets are location-capable no later than May 31, 2004; and
  - (iv) Ensure that 100 percent of all new digital handsets activated are location-capable no later than November 30, 2004.
  - (v) Ensure that penetration of location-capable handsets among its subscribers reaches 95 percent no later than December 31, 2005.
- (2) Once a PSAP request is received, the licensee shall, in the area served by the PSAP, within six months or by September 1, 2003, whichever is later:
- (i) Install any hardware and/or software in the CMRS network and/or other fixed infrastructure, as needed, to enable the provision of Phase II enhanced 911 service; and
  - (ii) Begin delivering Phase II enhanced 911 service to the PSAP.

Tier III carriers are also required to file an interim progress report by August 1, 2003.